

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG - 1 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Petition of WorldCom, Inc. Pursuant)
to Section 252(e)(5) of the)
Communications Act for Expedited)
Preemption of the Jurisdiction of the)
Virginia State Corporation Commission)
Regarding Interconnection Disputes)
with Verizon Virginia Inc., and for)
Expedited Arbitration)

CC Docket No. 00-218

In the Matter of)
Petition of Cox Virginia Telecom, Inc.)
Pursuant to Section 252(e)(5) of the)
Communications Act for Preemption)
of the Jurisdiction of the Virginia State)
Corporation Commission Regarding)
Interconnection Disputes with Verizon)
Virginia Inc. and for Arbitration)

CC Docket No. 00-249

In the Matter of)
Petition of AT&T Communications of)
Virginia Inc., Pursuant to Section 252(e)(5))
of the Communications Act for Preemption)
of the Jurisdiction of the Virginia)
Corporation Commission Regarding)
Interconnection Disputes With Verizon)
Virginia Inc.)

CC Docket No. 00-251

**VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T AND WORLDCOM'S THIRD SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Third Set of Data Requests served on Verizon jointly by AT&T and WordCom on July 27, 2001.

Handwritten signature and date: 07/3

GENERAL OBJECTIONS

1. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad, unduly burdensome or vague.

5. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

6. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

7. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. *See Memorandum Opinion and Order, In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption of Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(e)(5) of the Telecommunications Act of 1996, 16 FCC Rcd 2326 (2001).*

8. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T, WorldCom or any other entity.

9. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T or WorldCom.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to AT&T and WorldCom's Data Requests as follows:

ITEM:

AT&T/WCOM 3-1

Provide the definition that Verizon uses to calculate the lines, channels, and/or loops counted in ARMIS 4308 for Verizon Virginia for each type of lines (i.e. residential, business, single line business, special access lines and public).

- a. If the definition has changed within the past 7 years, provide the prior definition(s) and new definition(s) and the years applicable to each definition?

REPLY:

See General Objections.

VZ VA #370

ITEM:
AT&T/WCOM 3-2

Do the total switched lines reported on Verizon Virginia's ARMIS 4308 report, [Total_Switch_Acc_Lines_dj] include the following: resold lines ("TSR"), UNE- P, BRI ISDN, PRI ISDN, Frame Relay, ATM, ADSL, or lines used specifically by Verizon Virginia for its official business purposes.

REPLY:

See General Objections.

VZ VA #371

ITEM:

AT&T/WCOM 3-3

Define the special access line counts that Verizon-VA has reported to the FCC in the following ARMIS Report 4308, Line 320 categories: Spec_Acc_Lines_Analog_dk and Spec_Acc_Lines_Digital_dl.

- a. Are these lines leased only by IXCs to meet their POPs?
- b. Do ISPs lease special access lines?
- c. How many line equivalents is one PRI ISDN?
- d. Is unused capacity included?
- e. If an OC48 is partially lit, is it still counted as an OC48?
- f. When an aggregator is leasing OC48 transport services but only using part of the connection for IXC traffic, is it all counted as a special access service?
- g. Can an IXC or any other aggregator lease a special access line under interstate tariff and use it exclusively or predominantly for intraLATA purposes?

REPLY:

See General Objections.

VZ VA #372

ITEM:

AT&T/WCOM 3-4

Define the private line counts reported on line 1451 in the FCC's ARMIS 4304 report [# C&WF - CAT.1 EXC.LINE PRIV.LINE.LOOPS FOR ALLOC.]

- a. Does line 1451 of the ARMIS 4304 report facilities or channels?
- b. Are copper voice grade lines, fiber facilities or both are reported in this ARMIS account?
- c. Are special access facilities included in this line count?
- d. Are these point-to-point connections between customers?
- e. Are xDSL services included?
- f. Are Verizon line counts included in this total?
- g. Are dedicated lines connected to the end-user at one end which pass through a Verizon switch and then to another carrier's network included.

REPLY:

See General Objections.

VZ VA #373

ITEM:

AT&T/WCOM 3-5

Provide the definition that Verizon uses to calculate the line counts included in Verizon Communications Investor Quarterly, for each type of lines (i.e. residential, business, single line business, special access lines and public)?

- a. If the definitions have changed within the past 7 years, provide the prior definition(s) and new definition(s) and the years applicable to each definition?
- b. Explain the difference for which line counts are included in this report, but absent from the 4308 report filed with the FCC?

REPLY:

See General Objections.

VZ VA #374

ITEM:

AT&T/WCOM 3-6

Do the total special access lines, reported on a DS0- equivalent basis, included in Verizon Communications Investor Quarterly, include the following: resold lines ("TSR"), UNE- P, BRI ISDN, PRI ISDN, Frame Relay, ATM, ADSL, private line under state tariffs, interstate special access lines, lines used for interoffice trunking, fiber rings-SONET for end user or leases, high capacity UNE loop or lines used for specifically by Verizon Virginia for its official business purposes?

- a. How many DS0 equivalents per BRI, ISDN, PRI ISDN, ADSL, fractional DS1, DS1, DS3, OC3 OC12, etc?
- b. Are leased lines included in the total line count?
- c. Are unused capacity included in the total?
- d. How is the utilization of high capacity service approximated?
- e. If a high capacity service is going through a CO node, is the service counted twice?
- f. How would Verizon count a leased OC48 ring with 5 connections points that each have 1 DS3 going to an individual customer?

REPLY:

See General Objections.

VZ VA #375

ITEM:
AT&T/WCOM 3-7

Provide the definition that Verizon uses to calculate the special access line counts reported on Verizon Communications Investor Quarterly?

- a. If the definition has changed within the past 7 years, provide the prior definition(s) and new definition(s) and the years applicable to each definition?
- b. Are these lines leased only by IXCs to meet their POPs?
- c. Do ISPs lease special access lines?
- d. How many line equivalents is one PRI ISDN?
- e. Is unused capacity included?
- f. If an OC48 is partially lit, is it still counted as an OC48?
- g. When an aggregator is leasing OC48 transport services but only using part of the connection for IXC traffic, is it all counted as a special access service?

REPLY: See General Objections.

VZ VA #376

ITEM:

AT&T/WCOM 3-8

Do the total switched lines reported on Verizon Communications Investor Quarterly include the following: resold lines ("TSR"), UNE- P, BRI ISDN, PRI ISDN, Frame Relay, ATM, ADSL, or lines used for specifically by Verizon Virginia for its official business purposes?

REPLY:

See General Objections.

VZ VA #377

ITEM:
AT&T/WCOM 3-9

Please provide all studies, analyses, and/or documentation of DS1 and DS3 costs and the relationship between the costs of these services for Verizon (the parent organization, Verizon-Virginia, (including Verizon-former Bell Atlantic and former GTE) for 1998, 1999, 2000 and 2001 and any projections developed for any portion of the 2002-2006 time period.

REPLY:

See General Objections.

VZ VA #378

ITEM:
AT&T/WCOM 3-10

Please provide all studies, analyses, and/or documentation of DS1 and DS3 costs and the relationship between the rates for these services for Verizon (the parent organization including former Bell Atlantic and former GTE) and Verizon-Virginia) for 1998, 1999, 2000 and 2001 and any projections developed for any portion of the 2002-2006 time period.

REPLY:

See General Objections.

VZ VA #379

ITEM:

AT&T/WCOM 3-11

Please provide Verizon-VA's common support expenses, including, but not limited to, the following ARMIS accounts Other PPE (ARMIS 6510), Network operations (ARMIS Acct 6530), Marketing (ARMIS 6610), Services expenses (6620), General and Administrative (6720), and Executive and Planning (6710) for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted), separately reported for the former Bell Atlantic-VA and former GTE-VA.

- a. For the ARMIS account Other PPE (ARMIS 6510), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic -VA and GTE-VA.
- b. For each ARMIS sub-account for network operations expense including Power (6531), Network Administration (6532), Testing (6533), Plant Operations Administration (6534), Engineering (6535)), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for former Bell Atlantic -VA and GTE-VA.
- c. For each ARMIS sub-account for Marketing (ARMIS 6610), including: Product Management (6611), Sales (6612), Product Advertising (6613), Marketing Expense (6610), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic -VA and GTE-VA.
- d. For each ARMIS sub-account for Services expenses (6620), including Call Completion (6621), Number Services (6622), Customer Services (6623), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic -VA and GTE-VA.
- e. For each ARMIS sub-account of Executive and Planning (6710), including Executive (6711) and Planning (6712), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999, 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic -VA and GTE-VA.

- f. For each ARMIS sub-account of General and Administrative (6720), including Accounting & Finance (6721), External Relations (6722), Human Resource (6723), Information Management (6724), Legal (6725), Procurement (6726), Research & Development (6727), and Other General & Administrative (6728), please break out expenses into underlying functions, include an activity description, and provide the expenses associated with each activity for 1998, 1999 2000, and 2001 (YTD) and 2001 (forecasted) for Verizon-VA, separately reported for the former Bell Atlantic –VA and GTE-VA.

REPLY: See General Objections.

VZ VA #380

ITEM:
AT&T/WCOM 3-12

Please provide any documents, including but not limited to reports, analysis and forecasts, prepared for or by Verizon (the parent organization) and Verizon-VA, separately for the former Bell Atlantic-VA and former GTE-VA, that forecast any or all of the following common support expenses categories for the next five years: Other PPE (6510), Network operations (6530), Marketing (6610), Services expenses (6620), General and Administrative (6720), and Executive and Planning (6710). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY:

See General Objections.

VZ VA #381

ITEM:
AT&T/WCOM 3-13

Please separately identify all costs associated with or expected to be incurred as a direct result of the Bell Atlantic/GTE merger in 2000 (actual), 2001 (actual YTD and forecasted) and 2002, 2003 and 2004 for Verizon (the parent organization) and Verizon-VA, separately identifying the costs attributable to former Bell Atlantic-VA and GTE-VA. Please identify these costs as recurring or non-recurring and provide a description of the expenditure. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #382

ITEM:
AT&T/WCOM 3-14

Please provide all studies or analyses that forecast or estimate the cost savings associated with the Bell Atlantic-GTE merger, for the parent Verizon and Verizon-VA (i.e. the combination of the former Bell Atlantic-VA and GTE-VA). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY:

See General Objections.

VZ VA #383

ITEM:

AT&T/WCOM 3-15

Please provide a list of all services offered by Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately. At a minimum include POTS, HDSL, ADSL, 2-wire loop, 4-wire loop, PBX, ISDN, Centrex.

- a. For the services identified in above, please provide the number of subscribers for 1998, 1999 2000 and 2001 (YTD and forecasted) for Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately.
- b. For each service identified above, please provide the rates associated with each service for 1998, 1999 2000 and 2001 (YTD and forecasted). To the extent that a rate for a particular service is customer specific, please provide the average rate, the minimum rate and the maximum rate provided by Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately, for each of the services during each year specified above.
- c. For each service identified above, please provide the capacity of each service, or average capacity, if actual capacity is not available, on a DS-0 equivalent basis for Verizon-VA, reporting the former Bell Atlantic-VA and GTE-VA separately,.

REPLY:

See General Objections.

VZ VA #384

ITEM:

AT&T/WCOM 3-16

Provide the following data for Verizon-VA for 2001 (ytd), 2001 (est.), 2002, 2003, 2004 and 2005.

- a. Number of calls completion: local, intralata, intrastate and interstate
- b. Dial equipment minutes: local, intrastate and interstate

REPLY:

See General Objections.

VZ VA #385

ITEM:

AT&T/WCOM 3-17

Provide all contracts Verizon has executed over the past three years for the purchase of digital loop carrier equipment.

- a. Please separately identify the contracts for Verizon, the parent company, Verizon-VA, the former Bell Atlantic-VA, and the former GTE-VA.
- b. Please provide all supporting analyses, including market surveys, bids and any other documentation used to develop each of these contracts.
- c. Please describe in detail the purchasing practice of DLC equipment. At a minimum provide the following information:
 - i. Describe the solicitation process of DLC equipment undertaken, by Verizon (parent) and Verizon- VA (separately for the former Bell Atlantic-VA and the former GTE-VA) over the past three years.
 - ii. Detail each purchase of DLC equipment made over the past three years. List the equipment purchased, the vendor purchased from, the date of purchase, the quantity purchased and the cost incurred by Verizon (parent) and Verizon- VA (separately for the former Bell Atlantic-VA and the former GTE-VA)

REPLY:

See General Objections.

VZ VA #386

ITEM:
AT&T/WCOM 3-18

Please quantify the amount of fiber cable (in route miles) that comprises the distribution plant for Verizon-VA. If the information is not known then provide the best estimate. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY:

See General Objections.

VZ VA #387

ITEM:
AT&T/WCOM 3-19

Referencing Verizon's Cost Studies, See "2.4 Summary of Costs by Wire Center.DOC" located in the "VA UNBUNDLED LOOP/ 2w_buls" subfolder, submitted electronically, please explain the differences between the DENSITY_CELL_ID and the TELRIC_CELL_ID by wire center. Explain the methodology behind how these zones are determined.

REPLY:

See General Objections.

VZ VA #388

ITEM:

AT&T/WCOM 3-20

Provide any information that Verizon –Virginia has that discusses the coordination or financial responsibility of telephone plant within new housing developments within Verizon's service territory.

REPLY:

See General Objections.

VZ VA #389

ITEM:
AT&T/WCOM 3-21

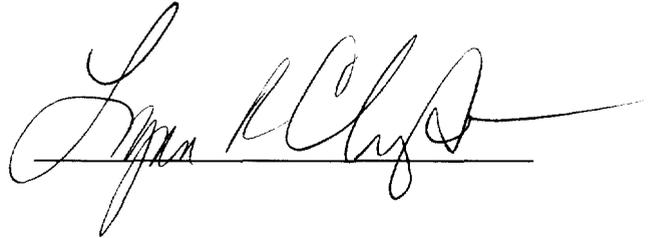
Please fill in the following table with statistics from Verizon Virginia's actual network and that which appears in their cost model filed in this proceeding.

REPLY:

See General Objections.

Data	Unit	Network	Cost Model in this Proceeding
<u>Total Route Miles</u>			
1 Underground Distribution	Miles		
2 Buried Distribution	Miles		
3 Arial Distribution	Miles		
4 Underground Copper Feeder	Miles		
5 Buried Copper Feeder	Miles		
6 Arial Copper Feeder	Miles		
7 Underground Fiber Feeder	Miles		
8 Buried Fiber Feeder	Miles		
9 Arial Fiber Feeder	Miles		
10 Underground Transport	Miles		
11 Buried Transport	Miles		
12 Arial Transport	Miles		
<u>Other Data</u>			
13 Number of Households	Number		
14 Number of DLCs	Number		
15 Number of FDI's	Number		
16 Trunk Ports	Number		
17 Announcement Trunks	Number		
18 E-911 Trunks	Number		
19 Intercept Trunks	Number		
20 Direct and Tandem Access Trunks	Number		
21 Intralata Toll Trunks	Number		
22 Direct Local and IntraLATA toll tru	Number		
23 Number of switches	Number		
24 Number of remote switches	Number		
25 Number of stand-alone switches	Number		
26 Verizon Owned Poles	Number		
27 Poles used by Verizon	Number		
28 Verizon Owned Poles Shared with Other Utilities	Number		
29 Verizon Owned Conduit	Miles		
30 Conduit used by Verizon	Miles		
31 Verizon Owned Conduit Shared with Other Utilities	Miles		

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lynn R. Charytan", written over a horizontal line.

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Dated: August 1, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T/WorldCom's Third Set of Data Requests were served electronically and by overnight mail this 1st day of August, 2001, to:

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* Served by hand delivery